

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

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In Re: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

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CASE NO: 2:15-MD-02641-DGC  
MDL No. 2641

This Document Relates to:  
2:16-cv-02166-DGC  
Brenda Ledbetter Cox vs. Bard, et al.

**UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT**

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached short form complaint to correct Paragraph 11 to read “04/19/2004” instead of “04/19/2014.” (see Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).
2. Plaintiff’s counsel has conferred with Defendants’ counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Brenda Ledbetter Cox requests that this Court grant this request to correct Paragraph 11 to “04/198/2004” and for leave to file the Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the attached Amended Second Amended Master Short Form Complaint.

Dated: January 23, 2017

/s/ Joseph R. Johnson  
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**Attorneys for Plaintiff**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of January, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson \_\_\_\_\_